

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

|                              |   |                                |
|------------------------------|---|--------------------------------|
| DWIGHT RUSSELL, et al.       | ) |                                |
|                              | ) |                                |
| Plaintiffs,                  | ) |                                |
|                              | ) |                                |
| v.                           | ) | Case No. 4:19-cv-00226         |
|                              | ) | (Class Action)                 |
| HARRIS COUNTY, TEXAS, et al. | ) | The Honorable Lee H. Rosenthal |
|                              | ) | U.S. District Judge            |
| Defendants.                  | ) |                                |
|                              | ) |                                |

**LIST OF EXHIBITS IN SUPPORT OF PLAINTIFFS' STATEMENT OF UNDISPUTED  
MATERIAL FACTS**

| Exhibit Number | Description   |
|----------------|---|
| 1              | Expert Report of Jennifer Copp, Ph.D., Nov. 17, 2022  |
| 2              | Expert Report of Krishnaveni Gundu, Aug. 15, 2022   |
| 3              | Expert Report of Melissa Hamilton, Ph.D., Aug. 29, 2022   |
| 4              | Declaration of Dwight Russell   |
| 5              | Declaration of Johnnie Pierson  |
| 6              | Declaration of Joseph Ortuno  |
| 7              | Declaration of Christopher Clack  |
| 8              | Declaration of Maurice Wilson   |
| 9              | First Declaration of Alex Bunin, Harris County Chief Public Defender, Apr. 6, 2020                                  |
| 10             | Second Declaration of Alex Bunin, Harris County Chief Public Defender, Apr. 6, 2020                                 |
| 11             | Supplement to Second Declaration of Alex Bunin, Harris County Chief Public Defender, Apr. 7, 2020                   |
| 12             | Third Declaration of Alex Bunin, Harris County Chief Public Defender, Apr. 23, 2020                                 |
| 13             | Fourth Declaration of Alex Bunin, Harris County Chief Public Defender, Nov. 22, 2022                                |
| 14             | Declaration of Sarah Wood, then-Policy Director of the Harris County Public Defender's Office, Mar. 26, 2020        |
| 15             | Second Declaration of Sarah Wood, then-Policy Director of the Harris County Public Defender's Office, Apr. 10, 2020 |
| 16             | Third Declaration of Sarah Wood, General Counsel of the Harris County Public Defender's Office, Nov. 18, 2022       |

| <b>Exhibit Number</b> | <b>Description</b>  |
|-----------------------|---|
| 17                    | Declaration of Former Hearing Officer Colin Amann, Oct. 18, 2022  |
| 18                    | Declaration of Defense Attorney Brent Mayr, Sept. 7, 2022   |
| 19                    | Declaration of Cole Lautermilch, Mar. 31, 2021  |
| 20                    | Declaration of Priyanka Shetty, Nov. 17, 2022   |
| 21                    | Declaration of Holly McGowan, Nov. 16, 2022   |
| 22                    | Rule 30(b)(6) Deposition of Harris County Sheriff's Office, Major Patrick Dougherty as corporate representative, Mar. 10, 2021  |
| 23                    | Deposition of Assistant District Attorney Jennifer Keith in her individual capacity and her capacity as corporate representative of the Harris County District Attorney's Office, Mar. 22, 2021 |
| 24                    | Deposition of Assistant District Attorney Jennifer Keith in her individual capacity and her capacity as corporate representative of the Harris County District Attorney's Office, Mar. 10, 2022 |
| 25                    | Deposition of Chief Criminal Law Hearing Officer Courtney St. Julian in her individual capacity and her capacity as corporate representative of Harris County, Mar. 25, 2021                    |
| 26                    | Deposition of then-Criminal Law Hearing Officer Jennifer Gaut, Mar. 23,   |
| 27                    | Rule 30(b)(6) Deposition of Harris County, Chief Public Defender Alex Bunin as corporate representative, Mar. 15, 2021  |
| 28                    | Rule 30(b)(6) Deposition of Harris County Pretrial Services, Spurgeon Kennedy as corporate representative, Mar. 11, 2021  |
| 29                    | Rule 30(b)(6) Deposition of Harris County Pretrial Services, Spurgeon Kennedy as corporate representative, May 4, 2021  |
| 30                    | Deposition of Harris County Sheriff Ed Gonzalez, Mar. 29, 2021  |
| 31                    | Deposition of Judge Brian Warren, Apr. 5, 2021  |
| 32                    | General Order Bond For Certain Offenses signed by Judge Herb Ritchie, Mar. 20, 2020   |
| 33                    | First Amended General Order Bond for Certain Offenses, Apr. 2, 2020   |
| 34                    | Direct Filing Order   |
| 35                    | Recommended Standard Bail Practices, Mar. 23, 2017  |
| 36                    | Joint Administrative Order No. 2017-01: Order Appointing Public Defender for Art. 15.17 Bail Hearings   |
| 37                    | Order To Disregard Directive by Harris County Judge, Apr. 3, 2020   |
| 38                    | Harris County Felony Bail Schedule, Effective July 29, 2017; Aug. 8, 2017   |
| 39                    | Executive Order GA-13, Mar. 29, 2020  |
| 40                    | Order of County Judge Lina Hidalgo, Apr. 1, 2020  |
| 41                    | State Commission on Judicial Conduct Documents  |
| 42                    | State Commission on Judicial Conduct Documents Part II  |
| 43                    | Binder of Written Court Directives  |

| <b>Exhibit Number</b> | <b>Description</b>             |
|-----------------------|--------------------------------|
| 44                    | Bail Hearing Video Index       |
| 45                    | Johnnie Pierson Bail Hearing   |
| 46                    | Joseph Ortuno Bail Hearing     |
| 47                    | A.P. Bail Hearing              |
| 48                    | A.R. Bail Hearing              |
| 49                    | B.L.M. Bail Hearing            |
| 50                    | B.Y. Bail Hearing              |
| 51                    | C.C. Bail Hearing              |
| 52                    | C.E. Bail Hearing              |
| 53                    | C.M. Bail Hearing              |
| 54                    | D.V. Bail Hearing              |
| 55                    | E.A. Bail Hearing              |
| 56                    | J.B. Bail Hearing              |
| 57                    | J.B.C. Bail Hearing            |
| 58                    | J.M. Bail Hearing              |
| 59                    | J.S. Bail Hearing              |
| 60                    | J.S.B. Bail Hearing            |
| 61                    | K-D.S. Bail Hearing            |
| 62                    | M.C-A. Bail Hearing            |
| 63                    | M.A.A. Bail Hearing            |
| 64                    | M.W. Bail Hearing              |
| 65                    | N.A. Bail Hearing              |
| 66                    | N.E.A. Bail Hearing            |
| 67                    | O.G. Bail Hearing Part 1       |
| 68                    | O.G. Bail Hearing Part 2       |
| 69                    | R.J.M. Bail Hearing            |
| 70                    | R.M. Bail Hearing              |
| 71                    | S.P. Bail Hearing              |
| 72                    | Index of Cases                 |
| 73                    | Dwight Russell Case Records    |
| 74                    | Johnnie Pierson Case Records   |
| 75                    | Joseph Ortuno Case Records     |
| 76                    | Christopher Clack Case Records |
| 77                    | Maurice Wilson Case Records    |
| 78                    | A.C. Case Records              |
| 79                    | A.L. Case Records              |
| 80                    | A.P. Case Records              |
| 81                    | A.R. Case Records              |

| <b>Exhibit Number</b> | <b>Description</b>  |
|-----------------------|---------------------|
| 82                    | B.A. Case Records   |
| 83                    | B.D. Case Records   |
| 84                    | B.J. Case Records   |
| 85                    | B.L.M. Case Records |
| 86                    | B.Y. Case Records   |
| 87                    | C.C. Case Records   |
| 88                    | C.E. Case Records   |
| 89                    | C.J. Case Records   |
| 90                    | C.M. Case Records   |
| 91                    | C.P. Case Records   |
| 92                    | D.V. Case Records   |
| 93                    | E.A. Case Records   |
| 94                    | E.K. Case Records   |
| 95                    | G.F. Case Records   |
| 96                    | G.M. Case Records   |
| 97                    | H.L. Case Records   |
| 98                    | J.A.M. Case Records |
| 99                    | J.B. Case Records   |
| 100                   | J.B.C. Case Records |
| 101                   | J.G Case Records    |
| 102                   | J.A.G. Case Records |
| 103                   | J.M. Case Records   |
| 104                   | J.R. Case Records   |
| 105                   | J.S. Case Records   |
| 106                   | J.S.B. Case Records |
| 107                   | J.W. Case Records   |
| 108                   | K-D.S. Case Records |
| 109                   | K.F. Case Records   |
| 110                   | K.S. Case Records   |
| 111                   | K.T. Case Records   |
| 112                   | L.F. Case Records   |
| 113                   | L.J.C Case Records  |
| 114                   | M. C-A Case Records |
| 115                   | M.A. Case Records   |
| 116                   | M.A.A Case Records  |
| 117                   | M.C. Case Records   |
| 118                   | M.G. Case Records   |
| 119                   | M.S. Case Records   |

| <b>Exhibit Number</b> | <b>Description</b>  |
|-----------------------|---|
| 120                   | M.W. Case Records   |
| 121                   | N.A. Case Records   |
| 122                   | N.E.A. Case Records   |
| 123                   | O.G. Case Records   |
| 124                   | P.C. Case Records   |
| 125                   | R.J.M. Case Records   |
| 126                   | R.M. Case Records   |
| 127                   | R.R.H. Case Records   |
| 128                   | S.B. Case Records   |
| 129                   | S.P. Case Records   |
| 130                   | T.C. Case Records   |
| 131                   | T.H. Case Records   |
| 132                   | V.S. Case Records   |
| 133                   | Z.G. Case Records   |
| 134                   | JPC Interview Process Instructions  |
| 135                   | Standard Operating Procedures Manual for Early Presentment Process, Apr. 4, 2018  |
| 136                   | Administrative Order No. 2019-01, Order Amending Local Rule, Harris County Criminal Courts at Law, Jan. 17, 2019  |
| 137                   | Misdemeanor bail order form   |
| 138                   | July 16, 2017 email from Judge Kelli Johnson to other judge members of the Standing Bail Bonds Committee  |
| 139                   | Apr. 3, 2020 email from Jim Bethke (JAD) to Kelli Johnson et al.  |
| 140                   | Mar. 30, 2020 email from Judge Susan Brown to other Felony Judges   |
| 141                   | Apr. 24 email from Hearing Officer Jennifer Gaut to Judge Frank Aguilar   |
| 142                   | Apr. 30, 2020 email from Hearing Officer Jennifer Gaut to Judge Greg Glass  |
| 143                   | July 19, 2017 email from Judge Kelli Johnson to Virginia Ryan (HCSO)  |
| 144                   | Jan. 14, 2020 email from Ed Wells (DCA) to members of Hearing Officer Hiring Committee  |
| 145                   | May 7, 2020 email from Judge Holly Williamson to members of the Hearing Officer Committee   |
| 146                   | Dec. 16, 2020 email from Sylvia Cherry (Office of Court Management) to representatives from the Hearing Officers, Pretrial Services, the Sheriff's Office, the District Attorney's Office, and the Public Defender's Office |
| 147                   | Oct. 8, 2020 email from Texas Department of Public Safety Division Chief to Jim Bethke (Justice Administration Department)  |
| 148                   | Aug. 18, 2020 email from Hearing Officer Jennifer Gaut to Pretrial Services staff   |

| <b>Exhibit Number</b> | <b>Description</b>   |
|-----------------------|--|
| 149                   | Aug. 18, 2020 email from Hearing Officer Jennifer Gaut to Pretrial Services staff                          |
| 150                   | Aug. 20, 2020 email from Pretrial Services Division Manager Troyce Carter to Hearing Officer Jennifer Gaut |
| 151                   | May 5, 2020 email from Pretrial Services Deputy Director Dennis Potts to Kelvin Banks                      |
| 152                   | Dec. 14, 2019 email from Ed Wells (CCL) to County and District Court Judges                                |
| 153                   | Apr. 12, 2020 email from Hearing Officer Lisa Porter to Judge Kelli Johnson                                |
| 154                   | Aug. 22, 2020 email from Hearing Officer Lisa Porter to Judge Danilo Lacayo                                |
| 155                   | Aug. 14, 2020 email from Hearing Officer Jennifer Gaut to Pretrial Services Officer Luis Zelaya            |
| 156                   | Dec. 18, 2020 emails between defense attorney and court clerk  |
| 157                   | Apr. 23, 2020 email from Allied Bonding Agency to District Court Administrator Vanessa Guerrero            |
| 158                   | Sept. 29, 2019 emails between hearing officers   |
| 159                   | Nov. 2019 emails from Hearing Officer Lisa Porter to felony judges   |
| 160                   | Mar. 16, 2021 email from Judge DaSean Jones to Pretrial Services staff                                     |
| 161                   | Nov. 7, 2018 email between Pretrial Services staff Troyce Carter and Dennis Potts                          |
| 162                   | Sept. 5, 2019 email from Hearing Officer Lionel Castro to other hearing officers                           |
| 163                   | Sept. 13, 2019 email from Hearing Officer Jennifer Gaut to Lisa Teachey (DCA)                              |
| 164                   | Feb. 10, 2020 email from Hearing Officer Lionel Castro to Hearing Officer Courtney St. Julian              |
| 165                   | Mar. 24, 2020 email from Hearing Officer Courtney St. Julian to Hearing Officer Diana Olvera               |
| 166                   | June 12, 2020 email from Judge Brian Warren  |
| 167                   | Mar. 23, 2020 email from court coordinator for Judge Danilo Lacayo   |
| 168                   | Apr. 17, 2020 email from Judge Chuck Silverman   |
| 169                   | Apr. 17, 2020 email from court coordinator Ana Melendez to Judge Chuck Silverman                           |
| 170                   | Apr. 17, 2020 email from District Court staff Vicki Long to Judge Chuck Silverman                          |
| 171                   | June 26, 2020 email from Judge Amy Martin to Virginia Ryan (HCSO)  |
| 172                   | Supplement to Expert Report of Krishnaveni Gundu, Dec. 7, 2022   |
| 173                   | July 16, 2018 email from Pretrial Services employee Carolina Castro to Luis Zelaya et al.                  |

| <b>Exhibit Number</b> | <b>Description</b>   |
|-----------------------|--|
| 174                   | petition for writ of habeas corpus seeking bond reduction for Zachary Green, Apr. 21, 2020   |
| 175                   | June 5, 2020 email from DCA Staff Attorney Lisa Teachey to the Felony Judges   |
| 176                   | Apr. 21, 2020 email from defense attorney to Felony Judge Silverman's court staff  |
| 177                   | Dec. 11, 2020 email from Clay Bowman to ABC 13   |
| 178                   | Dec. 9, 2020 email from Clay Bowman to Judge Herb Ritchie et al.   |
| 179                   | June 30, 2020 emails between Felony Judges and clerks  |
| 180                   | Jan. 12, 2019 email from Peyton Peebles to Kelvin Banks & Dennis Potts   |
| 181                   | Oct. 8, 2019 email from Bertina Johnson to Pretrial Services staff   |
| 182                   | June 25, 2020 email from Judge Brian Warren to Texas Ethics Commission   |
| 183                   | July 9, 2019 email from Judge Kelli Johnson to Kelvin Banks (PTS) et al.   |
| 184                   | Paul Heaton, The Effects of Misdemeanor Bail Reform, Quattrone Center for the Fair Administration of Justice (Aug. 16. 2022)         |
| 185                   | Bond Recommendation Form   |
| 186                   | Expert Report of Michael R. Jones, Ph.D., Aug. 24, 2022  |
| 187                   | May 14, 2020 email from Judge Greg Glass to Victoria Jimenez (HCSO) et al.)  |
| 188                   | Mar. 16, 2021 email from Harris County Pretrial Services Deputy Director Dennis Potts to Interim Director Spurgeon Kennedy et al.    |
| 189                   | Sept. 9, 2020 email from court coordinator Mindy Ochsner to Sheriff's Office staff and others  |
| 190                   | May 15, 2020 email from Scott Durfee (DAO)   |
| 191                   | Felony Total Bond Spreadsheet, Dec. 7, 2022  |
| 192                   | Brandon L. Garrett et al., Monitoring Pretrial Reform in Harris County: Fourth Report of the Court-Appointed Monitor (Apr. 18, 2022) |
| 193                   | Mar. 25, 2020 email from Judge Kelli Johnson to the Houston Chronicle  |
| 194                   | Dec. 2020 emails between Felony Judges, the Sheriff's Office, and defense attorneys  |
| 195                   | May 12, 2020 email from Chief Hearing Officer Courtney St. Julian to other Hearing Officers  |
| 196                   | July 6, 2020 Hrg. Tr.  |
| 197                   | May 28, 2020 Hrg. Tr.  |